

Hearing Aid Compatible Telephones
WT Docket No. 01-309
RM-8658

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Yorkville Telephone Cooperative, Inc.
and subsidiary,
Yorkville Communications, Inc.
4 Newbern Highway
Yorkville, Tennessee 38389
731-643-6121 Contact Phone
Trevor R. Bonnstetter, General Manager

Counsel: Lukas, Nace, Gutierrez & Sachs
Pamela L. Gist, Esq.
1650 Tysons Blvd., Suite 1500
McLean, Virginia 22102
Ph. (703) 584-8665
Email: pgist@fcclaw.com

Yorkville Telephone Cooperative, Inc. and its subsidiary, Yorkville Communications, Inc. (collectively referred to as "Yorkville") seeks to avail itself of the *de minimis* exception set forth in Section 20.19(e)(1) of FCC Rules, 47 U.S.C. §20.19(e)(1). Yorkville is eligible for the exception because it offers two or fewer digital wireless handset models.

(1) Digital wireless phones tested: Yorkville operates a TDMA/Analog 850 MHz system and acquires wireless telephone handsets manufactured by Nokia (collectively, "Vendor"). To Yorkville's knowledge, Vendors are not presently offering any TDMA or Analog devices that are rated M3 under standard ANSI C63.19-2005 ("Compliant Phones"). Accordingly, no phone devices have been tested to date.

(2) Laboratory used: Yorkville does not presently conduct internal testing of handset devices for compliance with the ANSI C63.19 standard. Should Yorkville begin to offer more than two handsets, Yorkville is likely to rely on its Vendors to conduct such testing, and to further rely on their representations regarding the compliance of each specific handset device.

(3) Test results for each phone tested: As indicated, no tests have been conducted to date.

(4) Identification of compliant phone models and ratings according to ANSI C63.19: Yorkville has not yet identified any available TDMA or Analog handset devices that are Compliant Phones.

(5) Status of product labeling: Yorkville typically relies upon its Vendors to label all products prior to their shipment to Yorkville's retail locations. To Yorkville's knowledge, no Vendor of TDMA or Analog handsets has made arrangements for product labeling that makes reference to HAC.

(6) Outreach efforts: Because no TDMA or Analog Compliant Phones have become available, and because Yorkville is eligible for the Section 22.19(e)(1) exemption, Yorkville has not undertaken an outreach program.

(7) Retail availability of compliant phones: No Compliant Phones are presently available in Yorkville's retail outlets.

(8) Incorporation of hearing aid compatibility features into newer models of digital wireless phones: Yorkville is unaware of any plans that its Vendors may have to incorporate HAC features into future TDMA phones.

9) Activities related to ANSI C63.19 or other standards work intended to promote compliance with the FCC Order: Yorkville is unaware of any activities that its Vendors may be undertaking to comply with the referenced FCC Order. Yorkville is ready and willing to offer compliant devices to interested customers if circumstances change such that Yorkville is no longer entitled to the exemption or undertakes a conversion to a different digital technology.

(10) Number of compliant and non-compliant phone models offered at this time: Yorkville's core assortment presently includes two models of cellular TDMA and AMPS handsets. Neither of these are Compliant Phones.

(11) Differences in handset offerings among regions in service areas, if any: There are no differences in handset offerings among regions in Yorkville's service area. Yorkville's handset offerings are presently consistent in all markets.

(12) Ongoing efforts for interoperability testing with hearing aid devices: To date, Yorkville has not conducted interoperability testing due to the non-availability of Compliant Phones.